

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.,

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION (TWO)
LIMITED, WELLS FARGO TRUST COMPANY,
N.A., solely in its capacity as OWNER TRUSTEE,
and UMB BANK, N.A., solely in its capacity as
OWNER TRUSTEE,

Defendants.

20 Civ. 9713 (LLS)

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the annexed Declaration of Jane O’Callaghan dated November 10, 2022, Declaration of Paul Sheridan dated November 10, 2022 and Declaration of Jeff E. Butler dated November 11, 2022 and the accompanying Memorandum of Law, Defendants AMCK Aviation Holdings Ireland Limited, Accipiter Investments Aircraft 4 Limited, Vermillion Aviation (Two) Limited, UMB Bank, N.A., not in its individual capacity but solely as owner trustee, and Wells Fargo Trust Company, N.A., not in its individual capacity but solely as owner trustee (collectively, “Defendants”), hereby respectfully move this Court, before the Honorable Louis L. Stanton, United States District Judge for the Southern District of New York, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure dismissing all

claims against all Defendants and such further relief as the Court deems proper and just.

Dated: November 11, 2022
New York, New York

Respectfully submitted,

s/ Jeff E. Butler

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